

## WAKEFIELD KENNEDY, LLC

Maureen O'Reilly, SEMD-CR  
Oreilly.maureen@epa.gov  
U.S. EPA  
Region 8 Headquarters  
1595 Wynkoop St.  
Denver, CO 80202

Re: Response to Request for Information Pursuant to Section 104(e) of  
CERCLA Smurfit Stone Mill Site in Missoula County Montana, SSID A804  
**CONFIDENTIAL DOCUMENTS PRODUCED**

Dear Ms. O'Reilly:

Wakefield Kennedy LLC ("Wakefield") provided a response to specific questions set forth in the United States Environmental Protection Agency's ("EPA") Request for Information pursuant to Section 104(e) of CERCLA, 42 U.S.C. § 9604(e), relating to the Smurfit-Stone Mill Site, located at 14377 Pulp Mill Road near the city of Missoula, Missoula County, Montana (the "Site"), dated April 28, 2020. To provide a full and complete response, Wakefield produced certain documents, which it has identified as containing confidential information.

The Instructions set forth in the aforementioned correspondence specifically notes that, to ensure the confidential nature of any documents, pursuant to Sections 104(e) of CERCLA and 40 C.F.R. Part 2, a claim of confidentiality must be formally asserted. Wakefield is now hereby making a formal claim of confidentiality for the documents enclosed with this correspondence, so as to permanently protect the confidential nature of the content therein. Pursuant to directions provided and to ensure protection, all enclosed confidential documents contain a cover sheet, marked "Business Confidential", in order to provide a sufficient notice of confidentiality.

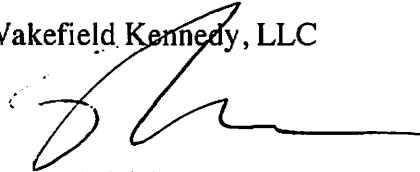
Wakefield maintains that all portions of the enclosed documents are confidential and should be considered permanently confidential. The confidentiality of these documents is important to Wakefield, and its business and competitive advantage and disclosure of the same may cause damage to Wakefield or the parties involved or associated with the matters contained in said documents. Wakefield has taken measures to ensure the content of said documents have been maintained in confidential manner. Further, to the best of Wakefield's knowledge, these

documents have not been disclosed to third parties, except those who were necessary to provide consultation to the parties in the transactions including attorneys and accountants for said parties.

Thank you.

Sincerely,

Wakefield Kennedy, LLC

A handwritten signature in black ink, appearing to read 'Steven J. Malsam', with a long horizontal flourish extending to the right.

Steven J. Malsam